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DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: <u>3-23-11</u>

BY FAX (212) 805-7949

Honorable P. Kevin Castel
 United States Courthouse
 500 Pearl Street
 New York, New York 10007-1312

Finley T. Harckham, Esq.
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March 22, 2011

MEMO ENDORSED

Re: Illinois National Insurance Company, The Insurance Company of the State of Pennsylvania, and National Union Fire Insurance Company Of Pittsburgh, Pa (collectively, "Plaintiffs")
 v. Tutor Perini Corp.
Index No. 11-cv-00431 (PKC)

Dear Judge Castel:

We represent Defendant Tutor Perini Corporation ("Tutor Perini") in the above referenced matter. Pursuant to section 1(C) of your Honor's Individual Practices, this letter serves to request a further extension of time for Tutor Perini to respond to the Complaint.

There have been two previous extensions of time with respect to the deadline to respond to the Complaint. The first extension (from February 15, 2011 to March 17, 2011) was based on Tutor Perini's request for additional time to engage counsel and evaluate the Complaint. The second extension (from March 17, 2011 to March 31, 2011) was requested by the parties in order to permit time to continue settlement discussions which may lead to a resolution of this action. Based on the status of those settlement discussions, however, in order to reach any resolution of the issues involved in this matter the parties believe that additional time will likely be required beyond the current March 31, 2011 deadline. Accordingly, the parties respectfully request a sixty day extension of time – from March 31, 2011 to May 30, 2011 – for Tutor Perini to respond to the Complaint, and further request that the Rule 16 Conference currently scheduled for April 29, 2011 be postponed to a date convenient for the Court after May 30, 2011.

*Time to respond extended to
 May 30. Conference adjourned from
 April 29 to June 7, 2011 at 10:30 a.m.
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Plaintiffs have reviewed this letter and join in this request. This current requested extension will not affect any other scheduled dates.

Respectfully Submitted,


Finley T. Harckham

cc: John D. Hughes